

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Cr. No. 1:19-cr-10040-JTF</b>
	)	
<b>ALEXANDER ALPEROVICH, M.D.</b>	)	

**MOTION TO CONTINUE REPORT DATE**

Comes the defendant, Alexander Alperovich, M.D., through counsel, and respectfully moves this Court for a continuance of the report date in this matter currently scheduled for April 21, 2021, at 9:00am [Doc. 207].

In further support, the following is stated:

(1) On February 22, 2021, a report date was held before the Court in which scheduling issues were addressed [Doc. 206]. The Court set a separate report date for Dr. Alperovich to be held on April 21, 2021 at 9:00am, given that the parties represented it is anticipated that a negotiated resolution will be reached as to Dr. Alperovich. *Id.*

(2) Defendant, through undersigned counsel, is still in the process of finalizing the language on a plea agreement and requests a continuance of this report date to allow the parties additional time to finalize the language of the agreement. This week, counsel for the government is in trial in another matter in Memphis. The parties anticipate finalizing the plea agreement language on or before the end of next week, recognizing that counsel for the government is in trial. The parties request the report date be continued to April 30, 2021, if that date is convenient for the Court.

(3) Defense counsel is authorized to represent that counsel for the government does not oppose a continuance of the report date.

(4) This motion is not made for the purpose of procrastination or unreasonable delay in this matter or some other improper purpose, but rather so that counsel may provide the defendant with the effective assistance of counsel to which he is entitled, that the defendant receive zealous representation, and to allow counsel to engage in pretrial negotiations concerning resolution. *See* 18 U.S.C. § 3161(h)(7)(B); Tenn. Sup. Ct. R. 8, Rules of Prof. Conduct; U.S. Const. Amend. VI.

Respectfully submitted,

***RITCHIE, DILLARD, DAVIES & JOHNSON, P.C.***

/s/Stephen Ross Johnson

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/Stephen Ross Johnson